

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

                        )  
THERESA TAYLOR,                )  
                        )  
                        )  
Plaintiff,                    )  
                        )  
                        )  
v.                            )     Case No. 4:20-cv-00834  
                        )  
                        )  
DON WAGNER, et al.,          )  
Defendants.                  )  
                        )

**JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER**

Defendant Kansas City, Missouri, Board of Police Commissioners, by and through its members, Don Wagner, Mark Tolbert Cathy Dean, Nathan Garrett and Quinton Lucas, and Plaintiff, Theresa Taylor (“Parties”), respectfully request a protective order pursuant to Fed. R. Civ. P. 26(c), providing that certain records be produced on specified terms and restricting the dissemination of such records. As grounds for this motion, the Parties state:

1. The Parties agree the disclosures and discovery in this case may involve production of confidential materials and documents.
2. The Parties request a protective order for these records to prevent dissemination of confidential materials outside this litigation, for safety and security reasons.

3. The Parties agree that production of confidential materials and documents shall be subject to the terms of the proposed Protective Order that is attached to this motion.

4. The Parties stipulate that they are bound by the provisions of the proposed Protective Order that is attached to this motion effective as of the date of filing of this motion.

**WHEREFORE**, based on the foregoing, the Parties respectfully request the Court to enter the proposed Protective Order that is attached to this motion.

Respectfully Submitted,

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